

SINCE 1867

Woodruff & Edwards, Inc.

GRAY IRON, ALLOYED, AND NON-FERROUS CASTINGS, PATTERNS, READY-TO-ASSEMBLE CASTINGS

RECEIVED

APR 30 1982

**ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS**

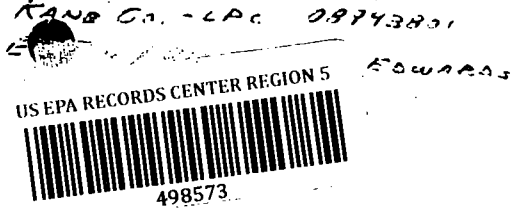
Kenneth P. Bechly
Northern Region Manager
Field Operations Section
Division of Land/Noise Pollution Control
1701 South First Street
Maywood, Illinois 60143

Dear Mr. Bechly,

This is in reply to your inquiry of April 20, 1982 requiring a response within ten days. We submit the following information. Section 1021 (d) indicates the City of Elgin is conducting a refuse disposal operation without a permit. As a portion of the contract deeding this tract of land from Woodruff & Edwards, Inc. to the City of Elgin, the landfilling operation must be continued until completed. Therefore this operation is permitted under Section 21 (d) since this right was retained.

This site is being inspected under the rules of a Sanitary Landfill. We ask that this be resolved since there is no garbage being deposited or other edible food which can sustain any vector. Therefore, the site should be inspected under Solid Waste regulation only. A letter was forwarded to C. E. Clark of Springfield on February 7, 1974 stating our position at that time. Conditions have improved. No other changes have been made. All wastes not generated by our Foundry are removed to a Sanitary Landfill by Elgin Wayne disposal contractors.

We have asked for details November 4, 1981 for applying for variation. Reply information from William Seltzer, Springfield,



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PHONES ... CHICAGO, AUSTIN 7-4900 ... SH 2-8700

Elgin, Illinois-60120

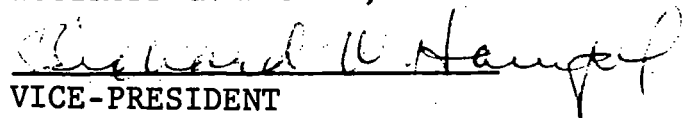
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Enforcement, indicates no specific forms were required, nor any check list for other assistance is available. Our information indicates we will be able to obtain such a variation; however, we sincerely question such a requirement. To ask for a variation from a Sanitary Landfill status implies we are not operating as such. Since we feel this is not a sanitary landfill, a variation should not be required. Further, the inspection report of July 11, 1974, August 29, 1974, September 16, 1974 and July 29, 1975 are marked 'variation', which indicates the inspectors realized this does not qualify for sanitary landfill type operation. Please be advised, our operation has not changed or deteriorated. We feel we have eliminated previous violations.

Violations cited (303(a)(c) and 305(a) are valid only if this operation is classified as a Sanitary Landfill. Inspection reports of December 28, 1977 and July 6, 1978 by R. A. Wengrow have sanitary crossed out. We concur this is NOT A SANITARY LANDFILL. Violation 305(a) indicates cover is not applied daily. Inspection reports of July 25, 1974 indicates cover is not required since sand is a satisfactory cover. A communication from C. E. Clark of Springfield on March 1, 1974 states slag, sand and ash do not require a daily cover.

Very truly yours, .

WOODRUFF & EDWARDS, INC.


VICE-PRESIDENT

RH/er